

**HACH ROSE SCHIRRIPA  
& CHEVERIE LLP**  
112 Madison Avenue, 10<sup>th</sup> Floor  
New York, New York 10016  
Telephone: (212) 213-8311

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NEW YORK**

TIMOTHY TANSKI, on behalf of himself and  
others similarly situated,

**Civil No. 15-cv-06260(LDW)(AKT)**

Plaintiffs,

-against-

AVALONBAY COMMUNITIES, INC.,

Defendant.

**NOTICE OF MOTION FOR AWARD OF ATTORNEYS' FEES AND COSTS  
AND APPROVAL OF SERVICE AWARD**

For the reasons set forth in the Memorandum of Law in Support of Plaintiffs' Motion for Attorneys' Fees and Costs and Approval of Service Award, along with the supporting Declaration of Frank R. Schirripa, and the exhibits attached thereto, Plaintiffs' respectfully request that the Court enter an Order:

- (1) awarding Class Counsel attorneys' fees in the amount of \$99,833.33;
- (2) reimbursing Class Counsel's litigation costs in the amount of \$4,632.18; and
- (3) for services rendered on behalf of the Lawsuit and Class Members, Named Plaintiff Timothy Tanski shall be awarded \$5,000.00. This service awards is in addition to any settlement amount Plaintiff Tanski is eligible to receive pursuant to the Agreement as members of the Rule 23 Class and FLSA Collective.

An omnibus Proposed Order regarding (1) Plaintiffs' Motion for Final Approval (Dkt. No 93), and (2) Plaintiffs' Motion for Attorneys' Fees and Costs and Approval of a Service Award has been filed with the Court. (*See* Proposed Order, Dkt. No. 93-1).

Dated: New York, New York  
July 24, 2019

Respectfully submitted,

**HACH ROSE SCHIRRIPA & CHEVERIE LLP**

By: /s/ Frank R. Schirripa  
Frank R. Schirripa  
John A. Blyth  
112 Madison Avenue, 10<sup>th</sup> Floor  
New York, NY 10016  
Telephone: (212) 213-8311  
Facsimile: (212) 779-0028

*Counsel for Plaintiffs and Putative  
Collective and Class*